



SINCE 1848

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December 15, 1993

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RUBEN B. MCCULLERS  
ENVIRONMENTAL SCIENTIST  
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY KS 66101

RCOM SECTION

RE: VISIT TO KNAPHEIDE ON DECEMBER 11, 1993

Thank you for traveling to Quincy to meet with us face-to-face. We think the meeting was very beneficial. You had a chance to see our West Quincy and temporary site first-hand and appreciate what the flood has done to our business. We, on the other hand, now understand better your thoughts on the supplemental environmental projects (SEP's).

Consistent with our meeting, this letter is meant to document our understanding of the direction The Knapheide Mfg. Co. needs to take to satisfy the Consent Agreement through implementation of the Closure Plan and SEP's.

- A. INCINERATOR CLOSURE - The previous plan will be reviewed in light of the flood and implemented if no changes are required.
- B. AUDIT PLAN - Since the West Quincy site is not currently used as a manufacturing site by Knapheide, the plan could be changed to perform an environmental assessment at the West Quincy site and perform an operations audit at the Quincy facilities. The operations audit would identify issues to be considered when implementing the new plant. The revised audit would carry the 60% offset rate.
- C. ELIGIBLE SEP'S - The following are the potential SEP's we discussed. Some are already implemented. Others, such as demolishing the wood treatment operation, will be done soon. Projects such as improved energy efficiency and better paint systems would be included with the new plant, a 2-2 ½ year project.

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RUBEN B. MCCULLERS  
December 15, 1993  
Page 2

1. Cost of Fighting the Flood - The Knapheide Mfg. Co. spent \$535,000 preventing the flooding of the plant and levee district. The efforts to prevent the flood bought us time to implement the contingency plan; removing all paints, thinners and hazardous wastes prior to the flood. Most of our flood fighting costs were incurred in the first week when we paid our employees to work on the levees.
2. New Paint Systems in the Temporary Location - The new spray paint systems for the platform sides and tool boxes reduce VOC emissions. Both systems utilize gas infra-red ovens from Infra-Red Technology. The ovens reportedly turn VOC's into CO<sup>2</sup> and H<sup>2</sup>O when the solvents come in contact with the 225+° platinum plates. Infra-Red Technologies has run independent test at the Ashland Chemical laboratory and is in the process of applying for a patent of the process.

The side assembly spray paint system replaced the dip paint system in West Quincy, thus replacing a process which used higher rates of solvent per gallon of applied paint.

3. Flood Clean-up Costs  
Knapheide has already spent over \$100,000 cleaning up the site from the flood. As you saw for yourself, many more dollars will be spent to complete the job.
4. Removing the Wood Treatment Building and Equipment  
The flood damaged the wood treatment building beyond repair. Per our discussion, we will dismantle the building, test the equipment and storage tank for hazardous material and properly dispose of the material and equipment. This action will permanently eliminate a potential contamination source.





RUBEN B. MCCULLERS  
December 15, 1993  
Page 3

5. Remove Above Ground Oil Tanks, Furnaces, Solvent Tanks and Underground Pipes

Knapheide will dispose of the above ground fuel oil, solvent and storage tanks and convert future heating to natural gas. The action will eliminate potential contamination sources.

6. Removal of Underground Dip Paint Tanks, Paint Overflow Tanks and Underground Fuel Oil Lines

The action will eliminate potential contamination sources.

7. Remove Paint Booths

Paint booths will be removed and disposed of as the buildings are made usable for tenants or storage.

8. Closure of Hazardous Waste Building

The cost to conduct sample tests and decommission the hazardous waste building would be considered a SEP.

9. Sampling the Fuel Oil and Solvent Plumes

Due to the flood, it will be necessary to resample the ground water monitoring wells and possibly add new wells to determine any changes in the fuel oil and solvent plumes prior to beginning remediation actions.

10. Solvent Recycling

Implement a program to recycle solvents versus ship off-site as wastes.

11. Drum Filter Compactor

Purchase compactors to crush the filters and reduce the number of drums shipped off-site thereby reducing the quantity of shipments of hazardous wastes which reduces potential spills.



RUBEN B. MCCULLERS  
December 15, 1993  
Page 4

12. Use of Environmentally Friendly Finishing Systems - Consultation

We will be bringing a cleaning and painting consultant to Knapheide to help select the best paint technology for the new facility aimed at minimizing future VOC emissions. The total cost is estimated at \$5,000 plus the in-house time.

13. New Plant Costs

- a. Implementation of paint technologies which exceed the VOC requirements.
- b. Improved energy efficiency of the new plant versus West Quincy.
- c. Other processes and improvements beneficial to the environment.

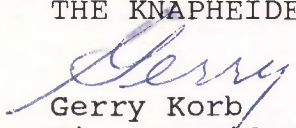
Once the audit plan is revised and approved, we will begin issuing the quarterly reports on the progress of compliance with the Consent Agreement. We will communicate the audit costs-to-date to you by a separate letter for credit against the SEP balance.

We discussed a large number of potential SEP's with you and have attempted to document the major ones in this letter. We think all of them have merit but would like you to consider them in the order written so the benefits occur in Region VII as much as possible and as soon as possible.

We look forward to your response.

Sincerely,

THE KNAPHEIDE MFG. CO.

  
Gerry Korb  
Vice President Operations

GWK:dd

cc: Harold Huggins, Environment & Facilities Manager  
Sandra Oberkfell, Rudnick & Wolf  
Bill Linsdsey, McLaren Hart